

EXHIBIT D

Fwd: Follow up

From: dkeyhani@keyhanillc.com <dkeyhani@keyhanillc.com>

Sent: Wed, Dec 21, 2022 at 3:20 pm

To: Scott Draffin

Scott- See below:

From: dkeyhani@keyhanillc.com

Date: December 20, 2022 at 2:09:16 PM EST

To: Lorri Lomnitzer <lorri@lomnitzerlaw.com>

Cc: dspelman@conceptlaw.com, mmulvaney@conceptlaw.com, Alex Brown <abrown@conceptlaw.com>, Scott Smiley <scott@conceptlaw.com>, Frances Stephenson <fstephenson@keyhanillc.com>

Subject: FW: RE: Follow up

Counsel- See emails below that I read on the meet and confer:

Darius

-----Original Message-----

From: "dkeyhani@keyhanillc.com" <dkeyhani@keyhanillc.com>

Sent: Saturday, December 10, 2022 9:09am

To: "Alex Brown" <abrown@conceptlaw.com>

Cc: "Frances Stephenson" <fstephenson@keyhanillc.com>

Subject: RE: Follow up

Alex, I don't want there to be any misunderstanding, I don't have authorization to agree to any extension on the r

Afternoon of January 6, 2023

Morning of January 9, 2023 or

Morning or Afternoon of January 10, 2023

Again, if we can't get an agreement and confirmation on the date for the deposition for Group III's representative

Thanks,

Darius

-----Original Message-----

From: "Alex Brown" <abrown@conceptlaw.com>

Sent: Saturday, December 10, 2022 7:27am

To: "dkeyhani@keyhanillc.com" <dkeyhani@keyhanillc.com>

Subject: RE: Follow up

Darius, yes, we have an agreement on the extension of time to respond to your client's subpoena through January transit that day coming back from family vacation, and need to get coverage myself, but my clients are also tryin scheduling?

Best Regards,
Alex
The Concept Law Group, P.A.
An Intellectual Property Law Firm

6400 North Andrews Avenue, Suite 500
Fort Lauderdale, Florida 33309
Office: (754) 300-1500
Direct: (754) 300-1325
Fax: (754) 300-1501
www.ConceptLaw.com
ABrown@ConceptLaw.com

NOTICE: This e-mail message and any attachment to this e-mail message contains confidential information that notify us immediately by return e-mail or by telephone at 754.300.1500 and delete this message. Please note that

From: dkeyhani@keyhanillc.com <dkeyhani@keyhanillc.com>
Sent: Friday, December 9, 2022 9:43 PM
To: Alex Brown <abrown@conceptlaw.com>
Subject: Re: Follow up

Alex, I didn't hear back from you, do we have an agreement on the proposed extension to respond to the subpoe

Darius

On Dec 7, 2022, at 12:43 PM, Alex Brown <abrown@conceptlaw.com> wrote:

Darius, thank you for your confirmation of the extension. We will likely respond to the subpoena sooner than Jar with you regarding their availability.

Best Regards,
Alex
The Concept Law Group, P.A.
An Intellectual Property Law Firm

6400 North Andrews Avenue, Suite 500
Fort Lauderdale, Florida 33309
Office: (754) 300-1500
Direct: (754) 300-1325
Fax: (754) 300-1501
www.ConceptLaw.com
ABrown@ConceptLaw.com

NOTICE: This e-mail message and any attachment to this e-mail message contains confidential information that notify us immediately by return e-mail or by telephone at 754.300.1500 and delete this message. Please note that

From: dkeyhani@keyhanillc.com <dkeyhani@keyhanillc.com>
Sent: Wednesday, December 7, 2022 10:13 AM
To: Alex Brown <abrown@conceptlaw.com>
Subject: Re: Follow up

I'm sorry, I meant we can agree to the extension to respond to the subpoena by January 4, 2023 provided that sh

Darius

On Dec 7, 2022, at 10:06 AM, dkeyhani@keyhanillc.com wrote:

Alex, I just called your office, please call me when you have a moment. Given our tight discovery schedule, we documents the afternoon of January 6, 2023. Please confirm this understanding.

Thanks,

Darius

On Dec 6, 2022, at 2:26 PM, Alex Brown <abrown@conceptlaw.com> wrote:

Darius, it is my understanding that the parties received the extension they were seeking from the TX Court; as such extension of discovery in TX, please advise immediately. Thank you!

Best Regards,
Alex
The Concept Law Group, P.A.
An Intellectual Property Law Firm

6400 North Andrews Avenue, Suite 500
Fort Lauderdale, Florida 33309
Office: (754) 300-1500
Direct: (754) 300-1325
Fax: (754) 300-1501
www.ConceptLaw.com
ABrown@ConceptLaw.com

NOTICE: This e-mail message and any attachment to this e-mail message contains confidential information that notify us immediately by return e-mail or by telephone at 754.300.1500 and delete this message. Please note that

From: dkeyhani@keyhanillc.com <dkeyhani@keyhanillc.com>
Sent: Thursday, December 1, 2022 12:36 PM
To: Alex Brown <abrown@conceptlaw.com>
Subject: RE: Follow up

The parties are working on requesting an extension from the Court, if we get it, we can agree to giving you until 1

Darius
-----Original Message-----
From: "Alex Brown" <abrown@conceptlaw.com>
Sent: Thursday, December 1, 2022 9:58am
To: "dkeyhani@keyhanillc.com" <dkeyhani@keyhanillc.com>
Subject: RE: Follow up

Understood. Has either side in the litigation sought an extension, and, if so, when is a decision expected on such

Best Regards,
Alex
The Concept Law Group, P.A.
An Intellectual Property Law Firm

6400 North Andrews Avenue, Suite 500
Fort Lauderdale, Florida 33309
Office: (754) 300-1500
Direct: (754) 300-1325
Fax: (754) 300-1501

www.ConceptLaw.com
ABrown@ConceptLaw.com

NOTICE: This e-mail message and any attachment to this e-mail message contains confidential information that notify us immediately by return e-mail or by telephone at 754.300.1500 and delete this message. Please note that

From: dkeyhani@keyhanillc.com <dkeyhani@keyhanillc.com>
Sent: Wednesday, November 30, 2022 10:52 PM
To: Alex Brown <abrown@conceptlaw.com>
Subject: RE: Follow up

Alex, Given that the current discovery deadlines is Dec. 15, at this time we can only stipulate to an extension on

Darius

-----Original Message-----

From: "Alex Brown" <abrown@conceptlaw.com>
Sent: Wednesday, November 30, 2022 10:03pm
To: "dkeyhani@keyhanillc.com" <dkeyhani@keyhanillc.com>
Subject: RE: Follow up

Darius, is December 13 the last day for your discovery period? Initially I thought you mentioned 30-days so that

Best Regards,

Alex

THE CONCEPT LAW GROUP, P.A.

AN INTELLECTUAL PROPERTY LAW FIRM

6400 NORTH ANDREWS AVENUE, SUITE 500

FORT LAUDERDALE, FLORIDA 33309

OFFICE: (754) 300-1500

DIRECT: (754) 300-1325

FAX: (754) 300-1501

[https://avanan.url-protection.com/v1/url?](https://avanan.url-protection.com/v1/url?o=WWW.CONCEPTLAW.COM&g=ZjVINGQ5NTExODM0YjUxMA==&h=YjJyY2EzZGZhMTQ5OWQ4M2ABROWN@CONCEPTLAW.COM)

[o=WWW.CONCEPTLAW.COM&g=ZjVINGQ5NTExODM0YjUxMA==&h=YjJyY2EzZGZhMTQ5OWQ4M2ABROWN@CONCEPTLAW.COM](https://avanan.url-protection.com/v1/url?o=WWW.CONCEPTLAW.COM&g=ZjVINGQ5NTExODM0YjUxMA==&h=YjJyY2EzZGZhMTQ5OWQ4M2ABROWN@CONCEPTLAW.COM)

NOTICE: This e-mail message and any attachment to this e-mail message contains confidential information that notify us immediately by return e-mail or by telephone at 754.300.1500 and delete this message. Please note that

-----Original Message-----

From: dkeyhani@keyhanillc.com <dkeyhani@keyhanillc.com>
Sent: Wednesday, November 30, 2022 5:14 PM
To: Alex Brown <abrown@conceptlaw.com>
Subject: Follow up

Alex- Following up on our call we can stipulate that your client can have until December 13 to respond to Swiss

Darius